

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

ART VAN FURNITURE, LLC, *et. al.*,¹

Debtors.

Chapter 7

Case No. 20-10553 (CSS)

(Jointly Administered)

ALFRED T. GUILIANO, in his capacity as Chapter 7 Trustee of Art Van Furniture, LLC, *et. al.*,

Plaintiff,

v.

UNITED FURNITURE INDUSTRIES, INC.; FIRST-CITIZENS BANK & TRUST COMPANY d/b/a THE CIT GROUP,

Defendants.

Adv. Proc. No. 22-50227 (CSS)

**STIPULATION EXTENDING TIME TO ANSWER, MOVE OR OTHERWISE
RESPOND TO THE COMPLAINT**

Alfred T. Giuliano, in his capacity as Chapter 7 Trustee of Art Van Furniture, LLC (“Plaintiff”), and United Furniture Industries, Inc. (“United Furniture” or Defendant,” and together with Plaintiff, the “Parties”), hereby stipulate and agree as follows:

¹ The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, are: Art Van Furniture, LLC (9205); AVF Holding Company, Inc. (0291); AVCE, LLC (2509); AVF Holdings I, LLC (2537); AVF Holdings II, LLC (7472); AVF Parent, LLC (3451); Levin Parent, LLC (8052); Art Van Furniture of. Canada, LLC (9491); AV Pure Sleep Franchising, LLC (8968); AVF Franchising, LLC (6325); LF Trucking, Inc. (1484); Sam Levin, Inc. (5198); and Comfort Mattress LLC (4463).

WHEREAS, on March 3, 2022, Plaintiff filed a *Complaint* (D.I. 1394; A.D.I. 1) (the “Complaint”) against United Furniture initiating the above-captioned adversary proceeding; and

WHEREAS, on March 4, 2022, Plaintiff filed and issued the summons (A.D.I. 2), which reflects that the summons and Complaint were served on United Furniture by first class and certified mail; and

WHEREAS, United Furniture’s deadline to answer, move, or otherwise respond to the Complaint is April 4, 2022; and

WHEREAS, counsel for the Parties have agreed to extend the time for United Furniture to answer, move, or otherwise respond to the Complaint through and including May 4, 2022.

NOW THEREFORE, in consideration of the premises and mutual covenants contained herein and other valuable consideration, the receipt of which is hereby acknowledged, it is stipulated and agreed by and between the Parties, as follows:

1. United Furniture’s time to answer, move, or otherwise respond to the Complaint is extended through and including May 4, 2022.

2. This extension is without prejudice to United Furniture’s right to seek further extensions of time from the Court to answer, move, or otherwise respond to the Complaint and Plaintiff’s rights to oppose any such request.

[Signature page follows]

Dated: March 29, 2022

**PACHULSKI STANG ZIEHL & JONES
LLP**

/s/ Peter J. Keane

Bradford J. Sandler, Esq. (DE Bar No. 4142)
Andrew W. Caine, Esq. (CA Bar No. 110345)
Peter J. Keane, Esq. (DE Bar No. 5503)
Jeffrey P. Nolan, Esq. (CA Bar No. 158923)
919 North Market Street, 17th Floor
P. O. Box 8705
Wilmington, DE 19899-8705 (Courier 19801)
Telephone: (302) 652-4100
Facsimile: (302) 652-4400
Email: bsandler@pszjlaw.com
acaine@pszjlaw.com
pkeane@pszjlaw.com
jnolan@pszjlaw.com

*Counsel to Plaintiff, Alfred T. Giuliano, Chapter
7 Trustee for the Estates of Art Van Furniture,
LLC, et al.*

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Jonathan M. Weyand

Donna L. Culver (No. 2983)
Curtis S. Miller (No. 4583)
Jonathan M. Weyand (No. 6959)
1201 North Market Street, 16th Floor
P.O. Box 1347
Wilmington, Delaware 19899-1347
Telephone: (302) 658-9200
Email: dculver@morrisnichols.com
cmiller@morrisnichols.com
jweyand@morrisnichols.com

*Attorneys for Defendant
United Furniture Industries, Inc.*